DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
ENVIRONMENTAL DIVISION
1220 PACIFIC HIGHWAY, RM 18
SAN DIEGO, CALIFORNIA 92132-5181

N00247.000111
NTC SAN DIEGO
SSIC #5090.3

5090
Ser 1832.KB/ 276
December 29, 1994

Ms. Alice Gimeno
Department of Toxic Substances Control
Base Closure Branch Region 4
245 W. Broadway, Suite 425
Long Beach, CA 92802-4444

Dear Ms. Gimeno:

At the request of the BRAC Clean-Up Team (BCT), the Navy has conducted additional research for the transmittal of additional information for Site 4 (Former Document Incinerator), Naval Training Center (NTC), San Diego, California. The additional research was required because the BCT did not feel there was enough information to recommend no further action for Site 4.

A presentation of results of the additional research was performed by the Navy's contractor on October 24, 1994. At this time, the BCT decided there was enough information to render a decision regarding Site 4 and requested the Navy to follow-up the presentation with a written memo describing the results of the research. This information is also included in the November 1994 Final Preliminary Assessment.

The attached memo describes the results of the research, and further supports the Navy's no further action recommendation. Based on this information, the Navy intends to close Site 4, and focus our attention on other IR sites. The Navy requests the agency agreement with no further action recommendation for Site 4. Efforts to expedite the agency agreement with the Navy's recommendation will be appreciated.

If you have any questions, please contact the undersigned for NTC at (619) 532-3329.

Sincerely,

Kurt Baer

KURT BAER
Remedial Project Manager
By direction of
the Commanding Officer

Attachment

SITE DESCRIPTION
AND ACTIVITY NARRATIVE
FORMER DOCUMENT INCINERATOR - SITE 4
NAVAL TRAINING CENTER (NTC)
SAN DIEGO, CALIFORNIA

SITE DESCRIPTION

According to a 1948 base map, the former document incinerator building (Building 40) was located at the southeast portion of NTC and was bounded on the north by the mattress sterilization building (Building 288), on the south by the former stockade (Building 290), on the east by Chauncey Road, and on the west by Evans Road. The incinerator building was 2,178 square feet in area. Use of the former document incinerator was discontinued in the late 1960's. Based upon aerial photographs reviewed at NTC, Building 40 was apparently demolished by December 1982.

Building 40 consisted of two incinerators with a smoke stack constructed between them. According to previous investigations performed at NTC, the incinerator was used to burn classified documents. Document incinerators are not designed to burn noncellulose based solid waste or refuse (Interim Federal Specification #FF-I-00535a). The largest capacity document incinerator is designed to burn 450 pounds of material an hour.

The elevation of the incinerator building pad was approximately 20 feet above grade, and the smoke stack extended approximately 43 feet above the pad. No evidence regarding hazardous substances use, storage, or disposal was found for the former document incinerator site.

SUMMARY OF INCINERATOR ACTIVITIES

Daily activities conducted at Site 4 consisted of burning waste paper (classified documents) at the former document incinerator. The first step of the incineration process involved the transfer of waste paper to the tipping area, located on the charging deck (2nd floor) of building 40. Stockpiled waste paper was placed in charging doors, where waste paper would fall onto a hearth grate above a primary combustion chamber.

Initially, the waste paper were burned within the primary combustion chamber. A conveyor mechanism would move the paper products across a hearth grate within the primary combustion chamber. Ashes from the primary combustion chamber would be collected in self-contained, steel ash tanks. Subsequently, combustion gases from the primary combustion chamber entered a secondary combustion chamber (afterburner). The purpose of the afterburner was to remove organic components of the gas prior to exiting the stack.

Fuel Source

According to historical as-built drawings, the incinerators appeared to be fueled by a high-pressure, two-inch natural gas line. Once the contents were burned, the residual ashes were transferred into self-contained, steel ash tanks, underlying each incinerator.

Soaking Tanks

Additional areas of interest within Building 40 included two soaking tanks located northeast and southeast of each incinerator on the charging deck (second story). The tanks were approximately 12 feet in length and 5 feet in width, and they appeared to be constructed of reinforced concrete. A drain was located within the southwest portion of each tank. It was inferred from the military handbook for incinerators that ashes were quenched (cooled) in the soaking tanks. The cooled ash was then transported offsite for disposal. No piping designs were located to determine the general direction of possible liquid flow.

Sumps

There was a total of four sumps on the firing floor (ground floor) of the incinerator building. The sump dimensions were approximately 3 feet by 3 feet. The depth of the sumps is unknown. They were located 10 to 15 feet north of incinerators 1 and 2. The surrounding surface appeared to be concrete, covered by steel grates. It appears that residual liquids generated during tipping area cleanup, overflow from the soaking tanks, and other miscellaneous wastewater drained by gravity into the sumps. No additional information describing the disposition of the sump contents was available.

LIKELIHOOD OF RELEASE

Considering the aforementioned discussion of the operational characteristics of the incinerator, an evaluation was made to assess the likelihood of a release of hazardous substances to soil, groundwater, surface water, and air pathways. The likelihood of a release of hazardous substances at Site 4 is discussed in the following paragraphs.

Soil Pathway

The incinerator has not been used since the late 1960s. Reportedly, it burned only classified government documents (SCS Engineers, Inc. 1986). There is no evidence of use or storage of hazardous substances at Site 4. Incinerator wastes (ashes) were stored in steel tanks, and were not in contact with the ground. Therefore, no release of hazardous substances to soil is anticipated.

Groundwater Pathway

The lack of hazardous substances use at Site 4, greatly reduces the possibility of a release which could have impacted groundwater. No evidence of a release of hazardous substances to soil was discovered. Therefore, groundwater is not expected to be impacted from incinerator operations.

Surface Water Pathway

The incinerator was reported to burn only paper, and no hazardous substances were used at the site. No evidence of a direct release of hazardous substances to surface water was discovered. An indirect release of hazardous substances to surface water also was unlikely because the incinerator does not appear to be a probable source of groundwater contamination.

Air Pathway

By virtue of its operation, it is not likely that emissions of hazardous substances from the stack to air could have occurred while the incinerator was in operation. The incinerator was fueled by natural gas, and used a secondary combustion chamber (afterburner) to burn organic material from gases prior to exiting the stack. Use of the former document incinerator was discontinued in the late 1960's, and air emissions no longer released to the atmosphere.

FINDINGS

Based upon the data collected, it appears further action is not recommended for Site 4. Our finding is based on the following:

- No evidence of hazardous substances use or storage was discovered at Site 4;
- Reportedly, only classified documents were burned at Site 4;
- Ash was contained in steel, self-contained tanks, and disposed of offsite;
- Natural gas was used to fuel the incinerators; and
- Use of the incinerator was discontinued in the late 1960's.

According to the EPA's guidance document for performing preliminary assessments, the absence of hazardous substance use and/or storage at the site is sufficient cause for a no further action finding.